

Message

From: Siedschlag, Gregory [Siedschlag.Gregory@epa.gov]
Sent: 1/24/2020 2:30:27 PM
To: Keigwin, Richard [Keigwin.Richard@epa.gov]; Messina, Edward [Messina.Edward@epa.gov]; Layne, Arnold [Layne.Arnold@epa.gov]
CC: Han, Kaythi [Han.Kaythi@epa.gov]; Naimy, Nina [Naimy.Nina@epa.gov]; Dinkins, Darlene [Dinkins.Darlene@epa.gov]
Subject: RE: For your review: OPP/OGC: - BNV - Petition re: Treated Articles Exemption.

Importance: High

Will do. Kaythi, please send forward to OCSPP with Rick's edit. Thanks!

Greg Siedschlag

Chief, Communication Services Branch
Office of Pesticide Programs
U.S. Environmental Protection Agency
Phone: (703) 603-9044
Cell: (571) 319-7949
<https://www.epa.gov/pesticides>

From: Keigwin, Richard <Keigwin.Richard@epa.gov>
Sent: Friday, January 24, 2020 9:08 AM
To: Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>
Cc: Han, Kaythi <Han.Kaythi@epa.gov>; Naimy, Nina <Naimy.Nina@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Subject: RE: For your review: OPP/OGC: - BNV - Petition re: Treated Articles Exemption.

Deliberative Process / Ex. 5

From: Siedschlag, Gregory <Siedschlag.Gregory@epa.gov>
Sent: Friday, January 24, 2020 8:57 AM
To: Keigwin, Richard <Keigwin.Richard@epa.gov>; Messina, Edward <Messina.Edward@epa.gov>; Layne, Arnold <Layne.Arnold@epa.gov>
Cc: Han, Kaythi <Han.Kaythi@epa.gov>; Naimy, Nina <Naimy.Nina@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>
Subject: FW: For your review: OPP/OGC: - BNV - Petition re: Treated Articles Exemption.
Importance: High

Good morning,

Here is a response to a Bloomberg Environment inquiry. Bob Perlis in OGC cleared the first answer and the PRD teams working on neonics and the treated seed petition cleared answers 2 and 3. Please review by noon today.

Deliberative Process / Ex. 5

Q: I'm finally finishing my long-awaited story about pesticide seed coatings, and the "treated article" exemption. You did already provide some responses for about specific questions, however I did want to follow up about this citizen petition, from the Center for Food Safety. EPA posted it to the FR over a year ago.
<https://www.regulations.gov/docket?D=EPA-HQ-OPP-2018-0805>

1. Can you comment on whether or not EPA plans to address this petition in any way in the coming months? What's the typical process/timeline for petitions? Is the agency required to respond by a particular time?

The length of time it takes EPA to process and respond to a petition depends on the petition. There is no standard timeline for responding to a petition. Each is evaluated on a case-by-case basis.

2. So, I guess I can use this, unless there is something more specific EPA could say besides “we will respond when our analysis is complete.” For instance, is it reasonable to assume a response will come this year?

Deliberative Process / Ex. 5

3. Also, on related topic, I've been told by a number of researchers that EPA was in the process of collecting data for an efficacy study about the use of neonic seeds and corn, similar to the one it published on soybeans. <https://www.epa.gov/pollinator-protection/benefits-neonicotinoid-seed-treatments-soybean-production> Can EPA offer some clarity about why that study was cancelled?

Deliberative Process / Ex. 5

Thanks,

Greg Siedschlag

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From: Daguillard, Robert <Daguillard.Robert@epa.gov>

Sent: Wednesday, January 22, 2020 11:15 AM

To: OPP FEAD CSB <OPP_FEAD_CSB@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Goerke, Ariadne <Goerke.Ariadne@epa.gov>; Perlis, Robert <Perlis.Robert@epa.gov>

Cc: Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Subject: RE: OPP/OGC: - BNV - Petition re: Treated Articles Exemption.

More from the reporter. Thanks in advance:

I forgot that one of your previous response did actually address the petition.

“In 2017, EPA received a Petition to Regulate Coated Seeds under FIFRA that raises a number of questions related to treated seeds and the treated article regulation. In 2018, we opened a docket and invited public comment on the petition. The agency is reviewing comments received and will respond to the petition when our analysis is complete.”

So, I guess I can use this, unless there is something more specific EPA could say besides “we will respond when our analysis is complete.” For instance, is it reasonable to assume a response will come this year?

Also, on related topic, I've been told by a number of researchers that EPA was in the process of collecting data for an efficacy study about the use of neonic seeds and corn, similar to the one it published on soybeans.

<https://www.epa.gov/pollinator-protection/benefits-neonicotinoid-seed-treatments-soybean-production>

Can EPA offer some clarity about why that study was cancelled?

Thanks again, and apologies for the confusion.

Best,
Adam

Cheers, R.

Robert Daguillard
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From: Daguillard, Robert

Sent: Wednesday, January 22, 2020 10:42 AM

To: OPP FEAD CSB <OPP_FEAD_CSB@epa.gov>; Dinkins, Darlene <Dinkins.Darlene@epa.gov>; Goerke, Ariadne <Goerke.Ariadne@epa.gov>; Perlis, Robert <Perlis.Robert@epa.gov>

Cc: Dunton, Cheryl <Dunton.Cheryl@epa.gov>

Subject: OPP/OGC: - BNV - Petition re: Treated Articles Exemption.

BNV
Adam Allington
DDL ASAP

Good morning everyone,

Thanks in advance for any insight.

Cheers, R.

Robert Daguillard
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Hi Robert,

I actually have a media request for you today.

I'm finally finishing my long-awaited story about pesticide seed coatings, and the "treated article" exemption. You did already provide some responses for about specific questions, however I did want

to follow up about this citizen petition, from the Center for Food Safety. EPA posted it to the FR over a year ago.

<https://www.regulations.gov/docket?D=EPA-HQ-OPP-2018-0805>

Can you comment on whether or not EPA plans to address this petition in any way in the coming months? What's the typical process/timeline for petitions? Is the agency required to respond by a particular time?

Any clarity you could provide about the petition specifically, by COB today, would be greatly appreciated.

Thanks,
Adam

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Adam Allington
Chemicals and Pesticides Reporter

Bloomberg Environment

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